

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

LEE PERRY

§

Plaintiff,

§

v.

§

CIVIL ACTION NO. 4:19-CV-4757

§

WAYNE CHRISTIAN, ET. AL.

§

Defendants.

§

§

DISCLOSURE OF INTERESTED PARTIES

Pursuant to Federal Rule of Civil Procedure 7.1 and the Court’s December 9, 2019 Order for Conference and Disclosure of Interested Parties, Defendant American Petroleum Institute and Michael Sommers, CEO (collectively “API”)¹ files this Disclosure of Interested Parties, as follows:

1. As required by Federal Rule of Civil Procedure 7.1, American Petroleum Institute discloses that it is a nonprofit 501(c)(6) corporation organized under the laws of the District of Columbia.
2. As required by the Court’s December 9, 2019 Order for Conference and Disclosure of Interested Parties, API discloses that, to the best of its knowledge, the following are the persons, associations, firms, partnerships, corporations, affiliates, parent corporations, or other entities that are financially interested in the outcome of this litigation:

- a) American Petroleum Institute;

¹ Plaintiff’s Complaint could be construed to include API’s Chief Executive Officer, Mr. Michael Sommers, individually, as a Defendant. To the extent the Complaint includes Mr. Sommers as a Defendant, Mr. Sommers is included in this Motion with API.

b) Michael Sommers (to the extent the Plaintiff's Complaint could be construed to include American Petroleum Institutes's Chief Executive Officer, Michael Sommers, individually, as a Defendant).

3. Additionally, the other parties to this lawsuit, listed below, may also be persons, associations, firms, partnerships, corporations, affiliates, parent corporations, or other entities that are financially interested in the outcome of this litigation. Except as otherwise indicated below, American Petroleum Institute lacks sufficient knowledge regarding whether any of them are properly named or publicly traded:

- a) Wayne Christian;
- b) The Railroad Commission of Texas;
- c) Andrew Wheeler;
- d) The United States Environmental Protection Agency;
- e) Sonny Perdue;
- f) The United States Department of Agriculture;
- g) ConocoPhillips Corporation (as named in Plaintiff's Complaint; correct name of entity is ConocoPhillips and ConocoPhillips Company per Motion to Dismiss, Document No. 4);
- h) David A. Scott;
- i) The Mississippi State Oil & Gas Board;
- j) Marathon Oil Corporation;
- k) Bill Hill Oil & Gas Company;
- l) Hilcorp Energy Company; and
- m) Plaintiff Lee Perry.

Respectfully submitted,

ROTHFELDER & FALICK, L.L.P.

/s/ Michael C. Falick

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ATTORNEYS FOR DEFENDANT,
AMERICAN PETROLEUM INSTITUTE

CERTIFICATE OF SERVICE

I certify that on January 4, 2020, I served a true and correct copy of this document via ECF to all parties registered to receive service electronically, and via certified mail, return receipt requested, upon the counsel or parties listed below.

Lee Perry, *pro se Plaintiff*
P. O. Box 524203
Houston, TX 77052

/s/ Michael C. Falick

Michael C. Falick